Message

From: Withrow, Mark [MWithrow@portla.org]
Sent: 2/13/2018 10:32:07 PM
To: Randell, George [Randell.George@epa.gov]
CC: Sadrpour, Shirin [SSadrpour@portla.org]
Subject: RE: Wilmington Marine Services Proposed Sampling Plan for USEPA

Good Afternoon George,
Hope you are doing well. We wanted to inform you that we will be conducting the field work for the agreed upon sampling plan below beginning drilling on February 21. We plan to finish drilling on March 2, 2018. Please let us know if you have any questions.
Regards,

Mark Withrow, PE
Environmental Management Division
City of Los Angeles Harbor Department
310-221-4783 (office)
949-394-2194 (cell)

From: Randell, George [mailto:Randell.George@epa.gov]
Sent: Thursday, January 04, 2018 4:15 PM
To: Withrow, Mark <MWithrow@portla.org>; Sadrpour, Shirin <SSadrpour@portla.org>
Cc: Benfield, Heather <Heather.Benfield@tetratech.com>; ODonnell, Maclyn <Maclyn.O'Donnell@tetratech.com>; Curtis, Kathryn <KCurtis@portla.org>
Subject: RE: Wilmington Marine Services Proposed Sampling Plan for USEPA

Hello and good afternoon Mark and Shirin. USEPA thanks the both of you for your diligence in the characterization and delineation of PCBs at the Wilmington Marine Services Boat Yard (site). Based on the previous data provided by the Port of Los Angeles (Port), USEPA has determined that PCBs have not been thoroughly characterized at the site. USEPA has required the Port to address data gaps and further delineate the PCB impacts in accordance with 40 CFR 761.61 and 40 CFR 761 Subpart N. The email chain below describes the proposed sample and analysis procedures and, addresses all USEPA comments. USEPA concurs with the Ports proposed characterization/sample and analysis plan, and accepts the Ports response to comments. The Port of Los Angeles shall perform the characterization plan as described below. If you have any questions or concerns please contact me at your earliest convenience.

Thank you

George Randell
U.S. EPA
Land Division (LND-4-1)
RCRA Corrective Action Unit
75 Hawthorne Street
San Francisco, CA 94105
(415) 972-3439

From: Withrow, Mark [mailto:MWithrow@portla.org]
Sent: Thursday, January 04, 2018 11:04 AM
To: Randell, George <Randell.George@epa.gov>; Sadrpour, Shirin <SSadrpour@portla.org>
Cc: Benfield, Heather <Heather.Benfield@tetratech.com>; ODonnell, Maclyn <Maclyn.O'Donnell@tetratech.com>;

Curtis, Kathryn <KCurtis@portla.org>
Subject: RE: Wilmington Marine Services Proposed Sampling Plan for USEPA

Good Morning George,
Thank you for speaking with us this morning. As discussed on the phone we are sending out this response email to memorialize our conversation. We agree with your comments and have responded in **bold** blue text below. I have cc'd Kathryn Curtis on this email as she deals with the sediment side for the Port and she will send you a follow up email as requested. Please let us know if you need anything else.
Regards,

Mark Withrow, PE
Environmental Management Division
City of Los Angeles Harbor Department
310-221-4783 (office)
949-394-2194 (cell)

From: Randell, George [mailto:Randell.George@epa.gov]
Sent: Wednesday, January 03, 2018 11:24 AM
To: Withrow, Mark <MWithrow@portla.org>
Subject: RE: Wilmington Marine Services Proposed Sampling Plan for USEPA

Hello and Happy New Year Mark. I have received the proposed characterization sample and analysis plan. I have provided some comments below in red.

Thank you

George Randell

U.S. EPA
Land Division (LND-4-1)
RCRA Corrective Action Unit
75 Hawthorne Street
San Francisco, CA 94105
(415) 972-3439

From: Withrow, Mark [mailto:MWithrow@portla.org]
Sent: Tuesday, January 02, 2018 6:44 PM
To: Randell, George <Randell.George@epa.gov>; Sadrpour, Shirin <SSadrpour@portla.org>; Benfield, Heather <Heather.Benfield@tetratech.com>; ODonnell, Maclyn <Maclyn.O'Donnell@tetratech.com>
Subject: Fwd: Wilmington Marine Services Proposed Sampling Plan for USEPA

Good Evening George,

Attached please find our proposed sampling location map and a summary table of our previous groundwater sampling data which we had not provided. PCBs were not detected in the two grab samples that we collected to date. This data table doesn't include the detections/non-detections of PCBs – **Attached for your reference is a PCB table showing non-detects with reporting limits for the groundwater data.**

A brief explanation of our map and sampling plan is provided below.

- The entire Site has been divided into a 50-foot by 50-foot grid with a smaller grid of 25-foot by 25-foot grid to delineate the western section of the Site, based on observed elevated metals and PCBs; New locations are green circles.

- Previous sample locations without PCB analysis will be resampled for PCBs. These locations will be adjacent to the original sample locations (red Xs on the map);

  There seems to be red X's missing for Tt-WMS17 and Tt-WMS4. — **We will add a soil boring adjacent to WMS17 and WMS4 to be sampled for PCBs.**

  Is the resampling of Tt-WMS9 a soil or Hydropunch sample? — **The resampling of WMS9 will be a soil boring and analyzed for PCBs. We already have previous groundwater data for PCBs at this location.**

- Areas with elevated concentrations will be further delineated with 10-foot step-out sampling locations and include (yellow circles on the map)

  - TPH and PCB contamination near Tt-WMS38 and Tt-WMS39
  - Metal and PCB contamination near Tt-WMS53, Tt-WMS40, and Tt-MWS5

- Soil samples will be collected at 0.5, 2.5, and 5 ft bgs and analyzed for moisture content, PCBs, Metals, and TPH at all sampling locations;

  - Samples will be analyzed via USEPA Method 8082 with the Soxhlet extraction method (3540C) for PCBs
  - Samples will be analyzed via USEPA Methods 6010/7471 (mercury) for Title 22 Metals
  - Samples will be analyzed via USEPA Method 8015 for TPH-gasoline C4-C12 and TEPH C13-40;

- All analytical data will be reported on a dry weight basis. Please provide results in mg/kg (ppm). — **We will provide future tabulated data in mg/kg (ppm) on a dry weight basis.**

- Two groundwater samples will be collected via the Hydropunch technique within the two areas of highest concern: adjacent to locations

  Tt-WMS20 and Tt-WMS53 (blue circles) and will be analyzed for PCBs, Metals, and TPH-gasoline C4-C12 and TEPH C13-40;

  Please provide both filtered and unfiltered results for the groundwater samples. Would you also please sample for VOC as well. — **We will analyze groundwater samples with filtered and unfiltered testing along with including VOCs in the analytical program.**

We look forward to our upcoming conference call. Please let us know if you need anything else.

What are the results for the samples Tt-SB10 and 11 – **Attached for your reference is a table showing analytical results for SB10 and SB11. When this work was completed PCBs were not considered a chemical of potential concern based on previous site history. Therefore, we do not have PCB data at these locations.**

Are there any sewer/storm water drainage areas, or underground conduits? If so have they been sampled? – **We have not been able to locate any utility as-builts for the site. Based on previous site visits we are not aware of any storm drains or underground conduits. As discussed, we will complete a site reconnaissance during our next field mobilization and sample next to any storm drain or potential low spot where surface water could accumulate (if encountered) based on our consultant, Tetra Tech's, professional judgement.**

I propose two more additional samples to be taken in accordance with your proposed 10 foot grid just west of both previous PCB samples points at Tt-WMS55 and 57. I have provided an example with proposed sample locations. – **We will attempt to drill these locations with a hand auger until refusal is encountered. They will be adjacent to a retaining wall and we may encounter footings prior to our proposed sampling depth of 5 feet bgs.**

Regards,

Mark

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